

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
ERICA M. WILLIAMS :
 :
 :
Debtor(s) : CASE NO. 5-20-01367

OBJECTION TO CERTIFICATION OF DEFAULT

NOW COMES, Erica M. Williams, the above Debtor, by and through her counsel, Tullio DeLuca, Esq., and files this Objection to Certification of Default and states the following:

1. On July 14, 2020, a Motion to Dismiss due to material default was filed.
2. On February 1, 2023, Jack N. Zaharopoulos, Esq. filed a Certificate of Default stating that the Debtor has failed to cure the arrears.
3. Debtor's hours have been reduced at work, due to this being a slow time for her employer. Debtor will have the funds to cure the alleged default on or before February 15, 2023.
4. The Debtor requests that a hearing be scheduled on the Objection to the Certificate of Default.

WHEREFORE, the Debtor respectfully requests that this Honorable Court sustain the Objection to the Certification of Default and deny the dismissal of the Chapter 13 Case.

Respectfully submitted,

Date: February 2, 2023

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID #59887
Counsel for Debtor
381 N. 9th Avenue
Scranton, Pa 18504

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 2, 2023 he caused a true and correct copy of Debtor's Objection to Certification of Default to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com_

Date of Mailing: February 2, 2023

/s/Tullio DeLuca

Tullio DeLuca, Esquire